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Moss, William

From: Matthew Wright <matthew.wright@fpaa.com.au>
Sent: Friday, 18 October 2019 11:34 AM
To: Product Safety Regulation
Subject: Attention William Moss
Attachments: FPA Australia Submission (ACCC mandatory standard) Final.pdf; Letter to ACCC - Review of mandatory standard V5 FINAL.pdf

Dear William,

FPA Australia has submitted a response to the ACCC review of the mandatory standards for aerosol and non-aerosol fire extinguishers via the ACCC Consultation Hub (response ID ANON-PS6S-993U-6).

Unfortunately the ACCC Consultation Hub did not allow the uploading or attachment of documents. Although FPA Australia was able to answer all questions, we could not include diagrams or illustrations to capture our comments or previous correspondence regarding this matter.

Accordingly, please find attached a copy of FPA Australia's formal response which includes a request to meet with ACCC to discuss these matters further. Also attached is another document referenced in our formal response. Both of these documents will also be sent by post.

Thank you for taking the time to review this information and I look forward to hearing from you to organise a time to meet.

Regards,

Matthew Wright

General Manager - Technical Services / Deputy CEO

Fire Protection Association Australia

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17 October 2019

Director
Standards and Policy
Consumer Product Safety Branch
Australian Competition and Consumer Commission
CANBERRA ACT 2601

RE: Review of the mandatory safety standards for portable fire extinguishers

Thank you for the opportunity to make a submission in response to the 'Review of the mandatory safety standards for portable fire extinguishers' Consultation paper.

FPA Australia is a not-for-profit organisation with members in all Australian jurisdictions. Central to our vision is a focus on advocacy in order to influence change and deliver improved fire industry outcomes for the community. Our advocacy role includes promoting improvements in legislation, codes and standards which necessitates engagement with all states and territories and the federal government. Such advocacy is also complemented by development of our own guidance material; submissions to government inquiries and proposed legislative reforms; education and training services; and, the development of national accreditation schemes for individuals undertaking roles in the fire protection industry.

As the national peak industry body representing the fire industry, our members include the majority of companies that manufacture, supply, certify, install and undertake routine service work on aerosol and non-aerosol portable fire extinguishers. Access to this extensive experience uniquely positions us to provide opinion in relation to the key questions to assist the Australian Competition and Consumer Commission (ACCC) with making informed decisions.

The following pages outline our response to the key questions listed in the Consultation paper.

Thank you for the opportunity to provide this submission. These mandatory standards are an important part of our industry and as such, we request to meet with the ACCC at your convenience to present on, and discuss, our submission further. We would also like to express our interest in lending our expertise to the actual revision process for the non-aerosol mandatory standard should (as we hope) it is revised to adopt AS/NZS 1841:2007 and address other concerns.

Please do not hesitate to contact me by email at matthew.wright@fpaa.com.au or by phone on 0401 860 336 to organise a meeting.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Matthew Wright'.

Matthew Wright
Chief General Manager - Technical Services / Deputy CEO
Fire Protection Association Australia

FPA Australia's response to the ACCC Consultation paper's key questions

Our response to the key questions listed in the Consultation paper are as follows:

1. What is your preferred option and why?

FPA Australia prefers Policy Option 2 from the selection provided in the Consultation paper:

Option 2	Make a new mandatory standard for non-aerosol fire extinguishers and maintain the current mandatory standard for aerosol fire extinguishers
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Please note, however, FPA Australia believes modifications to Option 2 are necessary and this is discussed in our response to Question 5.

Option 2 is the preferred option for the following reasons:

- The current mandatory standard although useful in providing a clear regulatory framework for extinguishers, references the superseded voluntary standard for non-aerosol extinguishers (AS/NZS 1841-1997 series). The current voluntary standard (AS/NZS 1841-2007 series) counters shortcomings in the superseded version and include improvements, such as:
 - labelling;
 - filling tolerances;
 - an alternative method for determining effective discharge time of an extinguisher;
 - an alternative method for the discharge testing of carbon dioxide extinguishers after the high temperature component material test; and
 - others covered in the attached letter previously submitted to the ACCC recommending the adoption of AS/NZS 1841:2007.

To benefit from these improvements, this new voluntary standard should be referenced.

Note:

Voluntary standards (typically Australian Standards) are often legislated either by direct referencing (inclusion) in legislation or indirect referencing through legislated documents such as the National Construction Code that includes references to voluntary standards.

- Despite some other legislative requirements that prescribe the use of the voluntary standard (AS/NZS 1841), non-aerosol extinguishers and aerosol extinguishers are still available and provided to end users for applications that are not addressed by these other legislative requirements. This increases the importance of the mandatory standard to address this gap.

As extinguishers are provided for first attack use, by trained or untrained members of the community, a mandatory standard is vital to ensure extinguishers operate consistently and safely across all applications.

The mandatory standard provides a regulatory framework for extinguishers which applies to all extinguishers whether they are purchased voluntarily to protect against incidental home, vehicle, vessel or other fires, or purchased to comply with other established legislative requirements.

The mandatory standard imposes clear minimum requirements on manufacturers, distributors and suppliers that may supply extinguishers to domestic, commercial, industrial, mining and petrochemical end users or other sector end users.

This remains important not only for end users of extinguishers but also ensuring that extinguishers imported to Australia as the result of international manufacture, meet minimum local expectations for performance and safety.

- The mandatory standard should facilitate enhanced safety regardless of the end user by providing the following:
 - Manufacturing specifications;
 - Uniform instructions and marking specific to the type of extinguisher;
 - Uniform identification colours specific to the type of extinguisher;
 - Minimum performance and test criteria; and
 - Compliance criteria for confirming that all of these requirements above have been met, which can be applied to new extinguishers, existing extinguishers or extinguishers that need repair.
- The mandatory standard represent legislative requirements which prevent extinguishers that do not meet the safety expectations of Australia being distributed to end users who may be ill informed regarding extinguisher use and safety and therefore potentially vulnerable to products with inferior performance and safety requisites.

2. Do you agree with our assessment of the international standards?

Yes.

While FPA Australia supports the adoption of international standards as per the World Trade Organization (WTO) agreement on reduction of technical barriers to trade, the information in Section 6 of the Consultation paper reflects our understanding from our members that these international standards are not suitable for use in Australia, particularly due to the differing labelling, classification and test requirements.

Unlike other products, there is no International Organization for Standardization (ISO) standard or international agreement for extinguishers.

3. Would option 2 change your compliance costs for non-aerosol extinguishers?

FPA Australia is aware that some non-aerosol extinguisher manufacturers are complying with both the mandatory standard as well as the latest voluntary standard (AS/NZS 1841:2007). Therefore, if option 2 incorporated a change to reference AS/NZS 1841:2007, the impact of compliance costs is anticipated to be minor for many extinguisher manufacturers and distributors. For this reason, the change of reference is not expected to have any significant impact on competition in this market either.

Despite this, FPA Australia recommends an optional transitional period of three (3) years so that any additional compliance costs (where applicable) can be distributed over a reasonable period. This will also allow for the implementation of the transition by manufacturers and distributors not already complying the latest voluntary standard if this is adopted by the mandatory standard as we propose. We suggest that this three (3) year transition period would allow for overlap i.e. allow for the supply of

extinguishers to comply with any immediately superseded mandatory standard and any new mandatory standard from the day of its release.

The National Construction Code (NCC) is used by legislation to require the use of non-aerosol extinguishers in certain types of new buildings as a deemed-to-satisfy fire safety measure. The period of three (3) years we suggest for transition to a new ACCC mandatory standard, is consistent with the NCC's cycle of review, update and re-issue that industry is familiar with.

4. Is there any reason the mandatory standard for non-aerosol extinguishers should not reference the latest voluntary Australian standard AS/NZS 1841:2007?

Where a suitable transitional period of three (3) years is applied as suggested above, we do not see any reason why the mandatory standard for non-aerosol extinguishers should not reference the latest voluntary Australian standard AS/NZS 1841:2007.

However, to avoid the necessity to update the mandatory standards in the future, FPA Australia recommends that the mandatory standard should reference the latest edition of AS/NZS 1841 with a transitional period of three (3) years permitted from the publication date of a new revision of AS/NZS 1841 or its amendments.

The mandatory standard should consider such an approach for the following reasons:

- To avoid a repeat of the current situation where the 2007 edition of AS/NZS 1841 has not been considered for adoption until 12 years after it was published;
- There is existing precedence for such an approach. One example, is how some state and territory legislation references that latest edition of the voluntary product standard for smoke alarms, AS 3786, by referring to "AS 3786 as in force from time to time" rather than limiting the legislation to the latest edition available at the time the legislation is made effective (and therefore requiring amendment of the regulation to be able to recognise a new edition of AS 3786 when published); and
- A project proposal is currently being developed to revise AS/NZS 1841. This revision will facilitate its improvement and its ability to consider the changing hazards and restrictions that non-aerosol extinguishers may need to counter. These include, application on hazards like lithium-ion batteries and polar solvent based fuel fires, and the use of fluorine free foams rather than fluorinated foams due to legislative barriers in certain states.

If the mandatory standard is unable to automatically adopt the most contemporary voluntary standard as published (i.e. "as in force from time to time"), another option would be to include a requirement prescribed in the mandatory standard for it to be reviewed every three (3) years to ensure it remains up to date.

It should be noted, that the NCC currently also references the AS/NZS 1841:1997 series as a "secondary reference document".

As such, the NCC (or both the NCC and AS 2444) need to be updated to reference AS/NZS 1841:2007 (as proposed to be referenced in the ACCC mandatory standard).

By doing so, and by adopting a 3 year review cycle for the ACC mandatory standard in line with the NCC's 3 yearly cycle, would allow for the NCC and ACCC to be aligned. See Figure 1 below.



Figure 1 – Referencing of AS/NZS 1841:2007 by the ACCC Mandatory Standard and the NCC

5. Is there any reason the mandatory standard should not be adjusted so that it only applies to the supply of new non-aerosol fire extinguishers and to avoid the current regulatory overlap for routine servicing?

FPA Australia believes that while there is some overlap between the ACCC mandatory standard for non-aerosol extinguishers, and the legislative requirements for routine servicing, the extent of overlap is insufficient to avoid adjusting the mandatory standard to address this issue appropriately.

Figure 2 below outlines the current likely life of a non-aerosol extinguisher supplied to the Australian market for the purpose of complying with building regulation, when that regulation also requires routine servicing to be undertaken:

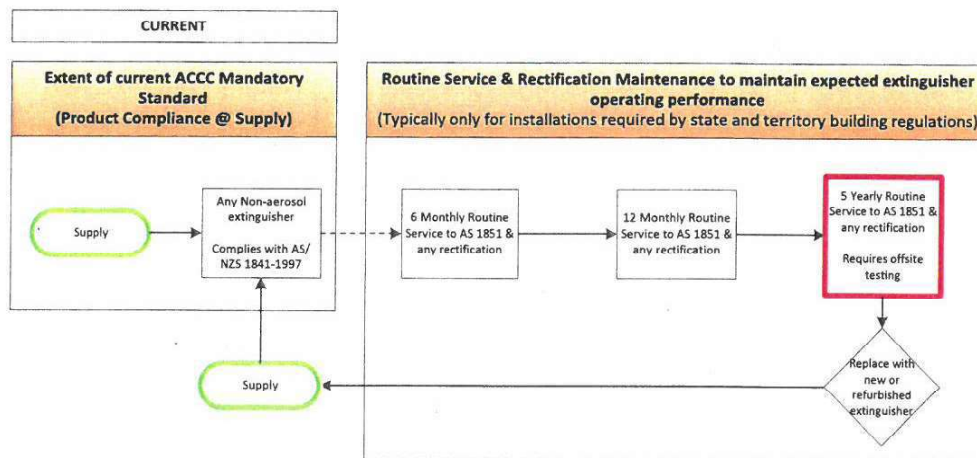


Figure 2 – Supply of non-aerosol extinguishers – New and Refurbished

This figure illustrates that where other regulation exists that mandates the routine servicing and rectification maintenance of extinguishers (typically state and territory based building regulation), extinguishers supplied to the market may be:

- (i) New; or
- (ii) Refurbished, having undergone routine servicing and any defects rectified to maintain the operating performance of the extinguisher.

The current mandatory standard is silent in this regard. It only refers to supply and does not elaborate on whether or not this supply must be a new extinguisher or can be a refurbished extinguisher as discussed above. Furthermore, FPA Australia advocates that this routine servicing is critical to maintaining the extinguishers ongoing performance.

The mandatory standard must address this directly. It must provide clarity that supply of an extinguisher that has been refurbished as a result of a requirement for routine servicing to AS 1851 is acceptable.

The mandatory standard should recognise that supplying a refurbished extinguisher is not supplying a new extinguisher to AS/NZS 1841, but is a legitimate process, subject to:

- (i) The extinguisher having originally complied with the mandatory standard when new (AZ/NZS 1841); and
- (ii) The extinguisher having undergone best practice routine servicing to AS 1851 with any defects rectified to ensure ongoing operational performance; and
- (iii) Written disclosure being provided to the person this refurbished extinguisher is supplied to, confirming this process has been applied.

Without this being clarified some contend that all extinguishers would only have a maximum 5 year life span under the mandatory standard.

To understand this dynamic further it is important to appreciate the application of AS 1851, rectifying defects and why refurbished extinguishers are supplied.

Application of AS 1851 and rectifying defects

AS 1851 includes prescribed routine service activities to be undertaken to maintain the reliability of fire protection systems and equipment such that they continue to meet the requirements of the approved design and are likely to do so until the next scheduled activity.

As such, non-aerosol extinguishers manufactured to AS/NZS 1841 that are serviced to AS 1851 and pass all activities are likely to continue to meet the performance requirements of AS/NZS 1841.

However, it is important to note that extinguishers need to pass all activities for this to be confirmed. Where the routine service activity identifies a defect, the extinguisher's owner is informed. The defect must be rectified (and the performance of that component re-confirmed) for the extinguisher to have passed the routine service and therefore continue to meet the performance requirements of AS/NZS 1841.

If a defect is not rectified, then whether the extinguisher continues to meet the performance of AS/NZS 1841 and therefore the mandatory standard has not been confirmed.

Refurbishing and replacement of extinguishers

It is currently common practice in the fire protection routine service industry to replace extinguishers during routine service when extinguishers need to be removed from site for testing or to rectify defects, in particular at the five yearly service, which involves hydrostatic testing. When this occurs, AS 1851 requires that the replacement unit is of the same type and size or a similar rating.

It is not specified in AS 1851 whether this is a new, existing or refurbished extinguisher. As mentioned above, we note that the current mandatory standard is silent in relation to this issue and our interpretation concludes that it would allow a new, existing or refurbished extinguisher to be supplied but this should be clarified.

In some instances the cost of undertaking the five yearly service can outweigh the cost of supplying a new extinguisher. However, replacement with refurbished extinguishers still occurs in other instances because:

- (i) It's not financially viable or safe to hydrostatically test extinguishers on site, but this does not mean they have reached the end of their service life;
- (ii) It is financially viable to keep them in circulation by removing from one site, completing routine service testing offsite and refurbishing to rectify any defects and supplying them to a new site confident in their operating performance;
- (iii) Existing extinguishers can be serviced under AS 1851-2012 and confirmed as meeting the performance requirements of AS/NZS 1841;
- (iv) FPA Australia is not aware of any instances where applicable servicing of extinguishers under AS 1851 has resulted in inferior performance and detrimental safety outcomes.
- (v) If replaced with new extinguishers, these 5 year old extinguishers simply get disposed of, which is less environmentally responsible because existing extinguishers are sent to landfill and new extinguishers need to be produced.

FPA Australia therefore contends that the proposed mandatory standard should allow for the options outlined in Figure 3 below.

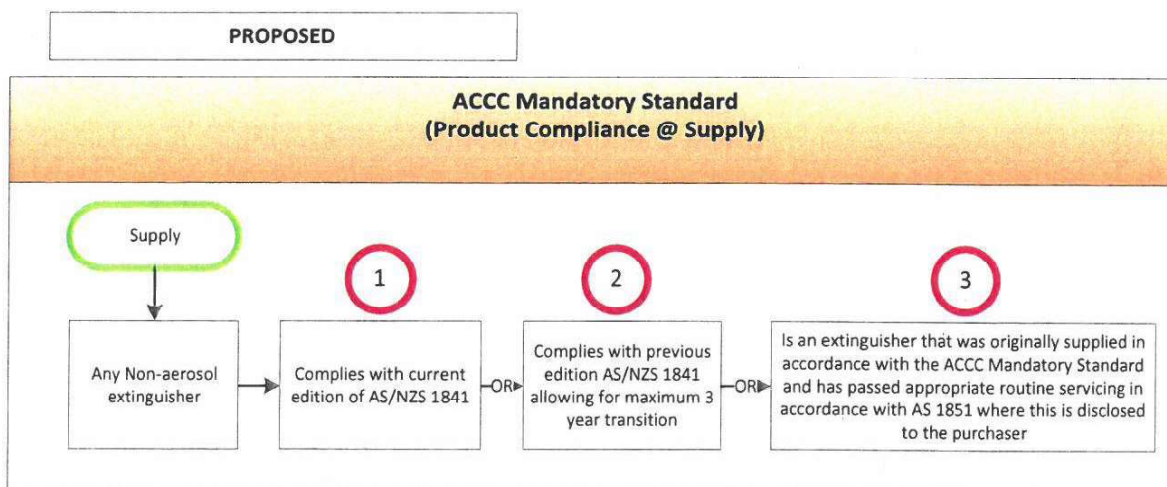


Figure 3 – Proposed mandatory standard options

Proposed modification to Option 2

FPA Australia agrees, as per the ACCC's option 2, that the mandatory standard for non-aerosol extinguishers should reference the latest edition of AS/NZS 1841 and that the current mandatory standard for aerosol fire extinguishers should be maintained.

However we recommend that this option be amended as follows to take account of the issues identified above:

“Option 2 Maintain the current mandatory standard for aerosol fire extinguishers and make a new mandatory standard for non-aerosol fire extinguishers allowing:

1. *New non-aerosol extinguishers supplied to end users to meet AS/NZS 1841:2007; and*
2. *Existing or refurbished non-aerosol extinguishers supplied to end users to:*
 - (i) have met AS/NZS 1841:2007 when new; and*
 - (ii) have passed appropriate servicing to AS 1851; and*
 - (iii) end users are provided with a disclosure statement confirming compliance with the above where the extinguisher supplied to them is not new.*
3. *Compliance with AS/NZS 1841:2007 for the purpose of the ACCC mandatory standard is met by the following:*
 - (i) For existing extinguishers; extinguishers that complied with the ACCC mandatory standard as in force immediately prior to the current ACCC mandatory standard.*
 - (ii) For extinguishers following the publication of the current ACCC mandatory standard, AS/NZS 1841 as in force from time to time with a three (3) year transition period permitted from the issue date of a new revision of, or amendment to, AS/NZS 1841.*

Note, appropriate servicing is defined as:

- *If the extinguisher is over 6 months old, then 6 monthly service to AS 1851*
- *If the extinguisher is over 12 months old, then a yearly service to AS 1851*
- *If the extinguisher is over 5 years old, then a 5 yearly service to AS 1851”*

Examples of application of amended Option 2:

- **New extinguisher to current mandatory standard**

Such an extinguisher can be sold up to 3 years after implementation of new ACCC mandatory standard.

Extinguisher can be supplied after the 3 years only if appropriate servicing undertaken and disclosure statement provided.

- **New extinguisher to new mandatory standard**

Must meet new mandatory standard (AS/NZS 1841:2007).

If new revision or amendment made to AS/NZS 1841, can continue to be supplied up to 3 years after publication of revision or amendment but after that 3 years it can only be supplied if appropriate servicing undertaken and disclosure statement provided.

- **Existing or refurbished extinguisher that met previous mandatory standard**

Extinguisher met previous mandatory standard (AS/NZS 1841-1997).

Must be appropriately serviced to AS 1851 and disclosure statement provided to be able to supply to end user.

The above changes, while complex, are important to ensure:

- All extinguishers supplied in Australia meet one set of requirements (current legislative reference of AS 1851 is insufficient to cover all installations and all jurisdictions regarding routine service)
- A transition period is included for the implementation of the new mandatory standard to allow sufficient time for manufacturers and distributors to meet the new requirements and phase out existing stock.
- Allowance for the recognition of future revisions or amendments to AS/NZS 1841 is included so that a review is not required every time a revision or amendment occurs.

As part of this, a 3 year transition to the new revision or amendment is included, accordingly.

- It is specifically required that existing and refurbished extinguishers must have met the applicable mandatory standard at the time. This is essential so that only extinguishers to the applicable mandatory standard (AS/NZS 1841 are permitted). If simply “routinely serviced to AS 1851” was included, this would allow extinguishers to any standard, including international standards which, as identified by the ACCC and FPA Australia, are not suitable for Australia.
- It accounts for, and identifies, the applicable routine servicing required for extinguishers. If simply “routinely serviced to AS 1851” was included, there would be significant disputes if there were missed or out of tolerance services in an extinguishers history. The appropriate servicing is based on the most significant level of service applicable to the age of the extinguisher.
- By accounting for existing and refurbished extinguishers that originally met the applicable mandatory standard at the time and which have appropriate servicing, the ACCC mandatory standard adopts a pragmatic and practical approach to the supply of existing and refurbished extinguishers, which creates clear expectations of industry practice.

6. Are there any other options the ACCC should consider?

See response to questions 4 and 5 above.

7. Do you have any other comments or suggestions?

FPA Australia has received many requests over the last few years for review and the definition of products that perform the same function as portable fire extinguishers but do not meet the definition of portable fire extinguisher as per AS/NZS 1841 and are not capable of meeting AS/NZS 1841 because they operate by a different mechanism. We are also aware of such manufacturers/suppliers making similar enquiries with the ACCC.

Such things include “ball” extinguishers, extinguishers that are incorporated within other products, extinguishers using innovative technologies that differ to the stored pressure type of extinguishers covered by AS/NZS 1841, etc.

To ensure a “level playing field” whereby it is clear that all products that function as a portable fire extinguisher are fit for purpose and safe for consumers to use, we would recommend as part of the review of the mandatory standard for extinguishers that consideration is given to how to address such ‘innovative’ portable fire extinguisher products. This may be by developing performance-based aspects or objectives that only suitable products can meet.



4 May 2012

Mr. John Wunsch
Director Regulatory Policy
Product Safety Branch
Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601

Dear John,

Consumer Product Safety Standard – Portable Fire Extinguishers

FPA Australia writes to you following our previous discussions and correspondence regarding the status of Consumer Product Safety Standards regulating the supply of portable non-aerosol fire extinguishers and fire extinguishers (portable aerosol).

This correspondence has been prepared following discussion with FPA Australia's Technical Advisory Committee 3/7 (TAC 3/7), whose members play an active role in the supply, installation and maintenance of portable fire extinguishers.

FPA Australia is aware that a mandatory consumer product safety standard for portable fire extinguishers was first declared in 1978. The original reason for its introduction was the presence on the Australian market of badly designed, poorly made fire extinguishers. These were incapable of satisfactorily performing the basic function of a portable fire extinguisher that is, putting out small fires. FPA Australia considers that these reasons for introducing the standard remain applicable today.

FPA Australia is also aware that the mandatory standard for non-aerosol fire extinguishers has been revised on several occasions to reference newer versions of relevant Australian Standards. The last amendment to the Mandatory Standard was gazetted on 25 August 2004 to reference the most recent amendments at the time to the 1997 series of AS1841 parts 1 to 8. We note that the 1997 series of AS1841 has since been superseded with the release of the 2007 series and this correspondence is, in part, to formally request a revision of the mandatory standard in this regard.

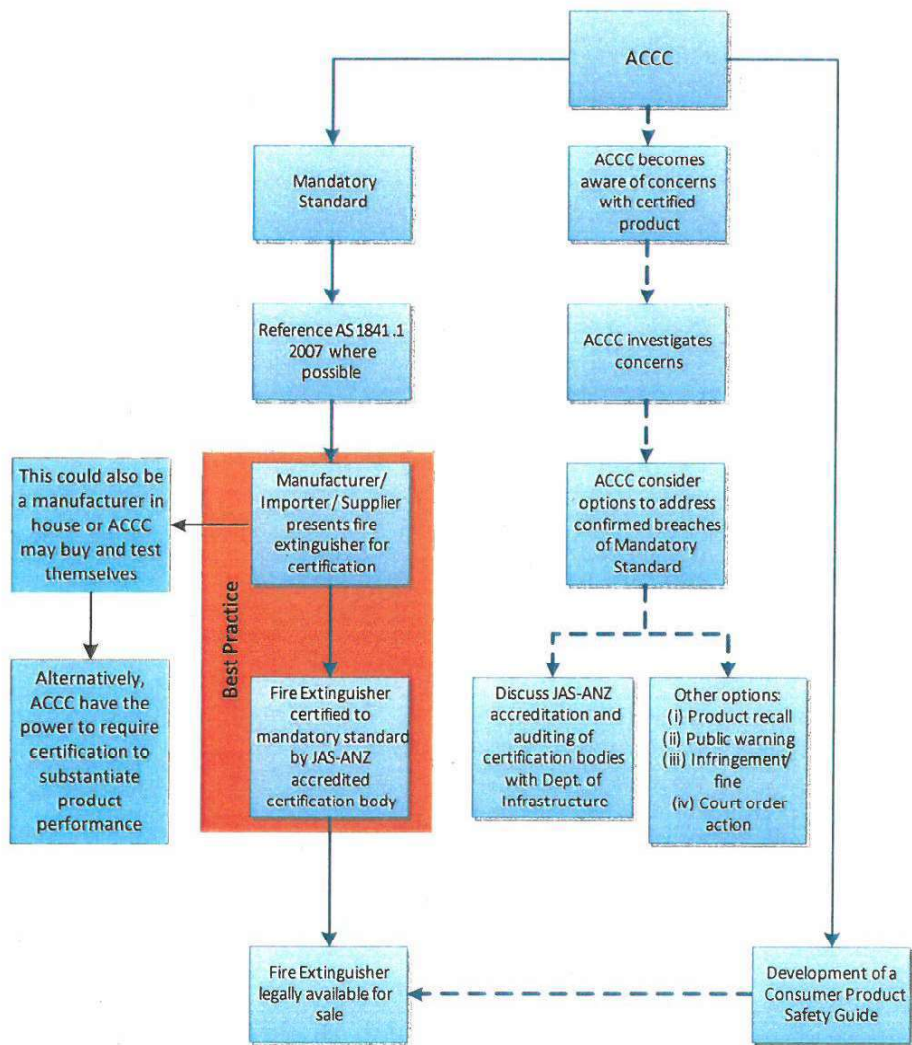
FPA Australia is of the firm view that the establishment of a new mandatory safety standard to replace the current consumer product safety standards for portable non-aerosol and portable aerosol fire extinguishers represents the most appropriate method of protecting the community from inferior and dangerous fire extinguishers being supplied to consumers.



FPA Australia's members have identified increasing occurrences of fire extinguishers being sold in Australia that may not be compliant with the mandatory standard. The Association believes that the increase may be attributable to:

1. The mandatory standard referencing an out of date and unavailable Australian / New Zealand standard; and
2. The method of accreditation and auditing of certification bodies by JAS-ANZ; and
3. Consumer awareness of the requirement for fire extinguishers to comply with the mandatory standard.

The diagram below represents our understanding of how the ACCC could assist in addressing the concerns raised by FPA Australia members and improve the occurrence of fire extinguishers sold in Australia being compliant with the mandatory standards.





Considering these issues, and the role ACCC and FPA Australia play in informing the community and industry respectively, FPA Australia has identified the following opportunities to increase awareness and application of the requirements:

1. Updating the existing mandatory standard associated with AS/NZS 1841.

Attached is a comparison table outlining how the current mandatory standard varies AS/NZS 1841 – 1997 and what variations with or without modification would be required if the mandatory standard referenced AS1841 – 2007. See Appendix 1.

Furthermore there are subtle differences between the 1997 and 2007 versions of AS/NZS 1841 that may also impact on the objective of the mandatory standard. Appendix 2 includes a comparison table outlining the changes between the 1997 and 2007 versions of AS1841.

2. Updating the existing mandatory standard associated with AS4353.

AS4353 has not been updated since the 1995 version; however it may also prudent to review this aspect. FPA Australia could identify any contemporary concerns with AS4353:1995 that may require addressing through the development of a new mandatory safety standard for the consideration of ACCC.

3. Identification of any aspects of the AS1841:2007 series and AS4353:1995 that may give rise to a conflict with Australian Competition Law.

FPA Australia would identify these to the best of our ability.

4. Development of an ACCC / FPA Australia guide for suppliers of fire extinguishers raising the awareness of the mandatory standard.

It is proposed that FPA Australia could develop a draft document and incorporate changes ACCC thought necessary to co-brand and support its publication via the ACCC and / or FPA Australia website.

5. Development of a Consumer Product Safety Guide for fire extinguishers.

6. Provide information regarding concerns with certified product and that JAS-ANZ processes may not be delivering expected outcomes in the marketplace. FPA Australia would also write directly to the federal Department of Innovation Industry, Science and Research who oversee JAS-ANZ to advise of these concerns.

FPA Australia is committed to supporting the ACCC to further explore these options and assist in the development of a revised safety standard for fire extinguishers. We look forward to the opportunity to further discuss these matters and work collaboratively with the ACCC to ensure that the best protection for the community can be assured.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Matthew Wright', is written over a light blue horizontal line.

Matthew Wright
Chief Technical Officer / Deputy CEO
Fire Protection Association Australia



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Appendix 1

Evaluation of the mandatory standard variations to AS1841 – 1997 and assessment of the need to maintain variation if AS1841 – 2007 was referenced by the mandatory standard

Item	Current Mandatory Standard Requirements	Effect	Recommended Action (based on adoption of AS/NZS 1841.1 to 8-2007)	Proposed (references to clauses are AS/NZS 1841.1 to 8-2007 clauses as applicable)
Voluntary Standard Reference				
1.	AS/NZS 1841.1 -1997 including amendments 1 – Feb 2001 and amendment 2 – April 2003. AS/NZS 1841 - 1997 parts 2 to 8.	The current (2007) voluntary standards are not referenced by the mandatory standard. This means that the latest technology and processes are not adopted.	Amend the mandatory standard.	Reference AS/NZS 1841.1-2007 and AS/NZS 1841 – 2007 parts 2 to 8.

Schedule of Variations to AS/NZS 1841.1:1997 – General Requirements				
Item	Current Mandatory Standard Requirements	Effect	Recommended Action (based on adoption of AS/NZS 1841.1 to 8-2007)	Proposed (references to clauses are AS/NZS 1841.1 to 8-2007 clauses as applicable)
1.	Inserting in clause 1.2 after the text "Parts 2, 3, 4, 5, 6, 7 and 8." the text "This standard does not apply to aerosol type fire extinguishers."	Excludes aerosol fire extinguishers from the mandatory standard.	Retain with modification.	Insert in clause 1.1 a new dot point 4 under the Note which states, "This standard does not apply to aerosol type fire extinguishers."



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Schedule of Variations to AS/NZS 1841.1:1997 – General Requirements

2.	<p>Deleting clause 1.3 and substitute the following: 1.3 NEW DESIGNS AND INNOVATIONS – Any material, design, method of assembly and procedure which do not comply with the specific requirements of this Standard may be used provided:</p> <p>(a) The portable fire extinguisher complies with the performance and test requirements of the Standard; and</p> <p>(b) A certifying body having JAS-ANZ registration for product certification to Australian/New Zealand Standard AS/NZS 1841 attests in writing that it is no less safe than a portable fire extinguisher manufactured in accordance with the specific requirements of this Standard. The relative safety of the portable fire extinguishers is determined with regard to the purpose of the extinguishers, any instructions and warnings relating to the use of the extinguishers, and what might reasonably be expected to be done with or in relation to the extinguishers.</p>	<p>Replaced clause 1.3 with alternative wording that allows for an extinguisher that meets specific performance or certification requirements to be compliant with the standard.</p>	<p>Delete. This variation can be deleted as it is included in its entirety in the 2007 standard.</p>	<p>Delete.</p>
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Schedule of Variations to AS/NZS 1841.1:1997 – General Requirements

3.	Deleting clause 2.7 entirely.	Deletes the requirement for the interior of an extinguisher to be clean and free from contaminants when filling.	Delete. Requirements for extinguisher interior to be clean etc... no longer included in 2007 version.	Delete.
4.	Deleting in clause 3.8.3 paragraphs 2 and 3, and the text "NOTE: Special conditions relating to discharge hose and fittings may be given in subsequent parts of this Standard."	Deletes the requirement that stipulates the length of discharge hoses. Removes the note that advises that special conditions for CO2 discharge hoses are included in AS1841.6	The NOTE has been removed. Paragraphs 2 and 3 have become point (d). Point (d) relates to hose length which could be considered to be a safety related matter. Hoses that exceed 1m could require a two person operation as it would be difficult to hold the end of the hose and operate the discharge mechanism at the same time. It is generally believed that few if any extinguishers on the market have hose lengths other than the minimum required and therefore deletion of this clause is likely to have little or no effect.	Delete or retain (no preference)
5.	Deleting in clause 3.9 the second sentence, "The charge for each extinguisher shall meet the requirements detailed below and AS 3676."	Deletes the requirement for charging procedures to be in accordance with another Australian Standard.	Delete. No need for specific variation. Requirements for charging to be in accordance with AS 3676 no longer included in 2007 Standard.	Delete.
6.	Deleting paragraph 2 in clause 4.1.5.	Deletes the requirement for visual examination, to ensure cylinder and fittings are clean, dry and free of corrosion, prior to application of painting or other protective finish.	This clause is retained in the 2007 version of the Standard. Retain.	Retain



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7..	Deleting Section 7 entirely.	Deletes the reference to applicable tests and test methods for determining compliance with AS/NZS 1841.1-1997. Some test methods include reference to other standards, namely AS/NZS 1850, 1841.5, AS2030.1 and NZ Dangerous Goods Regs.	Retain for the purpose of the Mandatory Standard as this includes references to other Standards.	Retain.
8.	Deleting clause 8.2(a) entirely and replacing it with the text: “(a) <i>Body Colour</i> For extinguishers other than those with polished stainless steel cylinders (which need not be painted), the exterior surface of the cylinder, including any skirt, boot or foot ring shall be coloured red (R13), and any hose clip retaining band shall be red unless it has a width of 10 mm or less.”	Allows for the introduction of stainless steel cylinders in the market without painting them red.	Clause 8.2(a) has become clause 8.2. The identification of fire extinguisher types is achieved by a combination of the body colour and the coloured band. The use of polished stainless steel cylinders results in confusion and the inability of consumers to confidently identify the extinguisher type based on the coloured band alone. Incorrect identification of the fire extinguisher could lead to serious injuries to the user. Retention of the original wording is considered to offer the better outcome for consumers whilst the alternative; to allow stainless steel cylinders offers little benefit that does not outweigh the disadvantages that would be established by modifying the clause.	Delete
9.	Inserting at the end of Table 8.1 the text: “Note: A supplementary band is required on extinguishers having polished stainless steel cylinders.”	Requires stainless steel cylinders to still be identified by introducing the requirement to provide a supplementary band.	Delete this requirement of the mandatory standard based on the above comment concerning the unacceptability of stainless steel cylinders.	Delete.

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10.	Deleting clause 9.1 entirely and replacing it with the text: "9.1 GENERAL The cylinder of each extinguisher shall be marked with identification and operating instructions (see Clause 9.3.3) which shall be clearly visible and legible."	Allows a broader application of instruction and marking requirements. Clause 9.1 in the Standard is more specific.	Clause 9.1 of the 2007 Standard introduces further specific requirements than the 1997 version. The inclusion of specific instructions and marking, including extinguisher use and maintenance requirements are directly related to product safety. Consistency in marking is critical for a piece of equipment that is used on an extremely infrequent basis. Users need to have clear, concise and consistent markings on extinguishers to improve familiarity and lead to improved chances of the extinguisher being operated safely and efficiently.	Delete.
11.	Deleting in clause 9.3.1 the text "approved" Inserting in clause 9.3.1 after the text "durable labels", the following text: "or other permanent means".	Removes the word approved, adds - other permanent means.	This requirement is now included in clause 9.1(e) of the 2007 Standard. Remove specific deletion, reference to 2007 Standard has same effect.	Delete.
12.	Deleting clause 9.3.5(b) entirely.	Removes the requirement to include the fire extinguisher registration number (FERN).	The 2007 Standard no longer includes a requirement to include the FERN within the servicing information. Remove specific deletion, reference to 2007 Standard has same effect.	Delete.



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13.	Deleting clause 9.3.6 entirely.	Specifies the method of applying labels and the background colour of labels.	The 2007 Standard includes these requirements in clause 9.1 (e) and (f). The updated clauses are more performance based than prescriptive and have been included to ensure consistency in the marking and labelling of extinguishers to reduce the likelihood of the user not understanding the information contained in the label or the label affecting the other identification requirements such as the band colour. Removal of these requirements would further weaken the ability of users to select the correct extinguisher type for the specific fire type leading to potential injury to users.	Delete.
14.	Deleting clause 9.5 entirely.	Removes the requirement for the manufacturer to make available service information including parts list, recharging instructions and guidance on serviceability and maintenance.	Similar requirement included in clause 9.7 of the 2007 Standard. Retain deletion.	Retain deletion but reference clause 9.7 of the 2007 Standard.



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Schedule of Variations to AS/NZS 1841.1:1997 – General Requirements

15.	Deleting in clause 10.2 the third paragraph.	Excludes requirement for manufacturer to ensure that correct charge material (excluding water) is provided to extinguishers shipped empty.	The 2007 Standard now includes this requirement in clause 10.2(a). Foam and Wet Chemical fire extinguishers are tested with the manufacturers specific charge material. Failing to provide this material with the extinguisher could lead to other entities in the supply chain substituting the required charge material with an inferior product that could significantly affect the performance of the extinguisher. The extinguisher's components and the charge material are intrinsically connected and must be provided together. This is a significant safety issue, despite that its inclusion may result in some difficulty for imported extinguishers to comply with the standard.	Delete.
16.	Deleting clause 10.3 entirely.	Excludes requirement for carbon dioxide, powder and vaporizing-liquid extinguishers to be shipped in the fully charged condition.	Powder and vaporizing liquid extinguishers are tested with the manufacturers specific charge material. Failing to provide this material with the extinguisher could lead to other entities in the supply chain substituting the required charge material with an inferior product that could significantly affect the performance of the extinguisher. The extinguisher's components and the charge material are intrinsically connected and must be provided together. This is a significant safety issue, despite that its inclusion may result in some difficulty for imported extinguishers to comply with the standard. CO2, like water is the exception to this requirement as both products are compounds that are not manufacturer specific.	Delete.



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Schedule of Variations to AS/NZS 1841.2:1997 – Water type fire extinguishers

Item	Current Mandatory Standard Requirements	Effect	Recommended Action (based on adoption of AS/NZS 1841.1 to 8-2007)	Proposed (references to clauses are AS/NZS 1841.1 to 8-2007 clauses as applicable)
1.	Deleting clause 2 entirely.	This clause references compliance to AS/NZS 1841.1 and where compliance differs, AS/NZS 1841.2 takes precedence.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 2 AS/NZS 1841.2-2007 instead.
2.	Deleting in clause 3 the text: "1841 Portable fire extinguishers 1841.1 Part 1: General requirements"	Deletes AS/NZS 1841 and 1841.1 as reference documents.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 3 AS/NZS 1841.2-2007 instead.
3.	Deleting in clause 6 the text "In addition to the requirements of AS/NZS 1841.1.	Deletes reference to AS/NZS 1841.	Retain, however clause 6 in the 2007 Version of AS/NZS 1841.2 includes more comprehensive requirements for marking than the 1997 version.	Retain but reference clause 6 AS/NZS 1841.2-2007.



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Schedule of Variations to AS/NZS 1841.3:1997 – Wet Chemical type fire extinguishers

Item	Current Mandatory Standard Requirements	Effect	Recommended Action (based on adoption of AS/NZS 1841.1 to 8-2007)	Proposed (references to clauses are AS/NZS 1841.1 to 8-2007 clauses as applicable)
1.	Deleting in clause 1 all text after "the body of the extinguisher."	Deletes NOTE: Some extinguishing agents may be classified by regulatory authorities as being hazardous. In such cases these authorities may require special markings on containers and special precautions to be taken when disposing of the extinguishants and their containers.	This NOTE is also included in the 2007 version of AS/NZS 1841.3. Retain deletion for purposes of the Mandatory Standard.	Retain but reference clause 1 AS/NZS 1841.3-2007 instead.
2.	Deleting clause 2 entirely.	This clause references compliance to AS/NZS 1841.1 and where compliance differs, AS/NZS 1841.3 takes precedence.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 2 AS/NZS 1841.3-2007 instead.
3.	Deleting clause 3 entirely.	Deletes AS/NZS 1841 and 1841.1 as reference documents.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 3 AS/NZS 1841.3-2007 instead.
4.	Deleting in clause 5 the text "In addition to the requirements of AS/NZS 1841.1.	Deletes reference to AS/NZS 1841.	Retain, however this is now included in clause 6 in the 2007 Version of AS/NZS 1841.3 along with some slightly different requirements than the 1997 version.	Retain but reference clause 6 AS/NZS 1841.3-2007.



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Schedule of Variations to AS/NZS 1841.4:1997 – Foam type fire extinguishers

Item	Current Mandatory Standard Requirements	Effect	Recommended Action (based on adoption of AS/NZS 1841.1 to 8-2007)	Proposed (references to clauses are AS/NZS 1841.1 to 8-2007 clauses as applicable)
1.	Deleting clause 2 entirely.	This clause references compliance to AS/NZS 1841.1 and where compliance differs, AS/NZS 1841.4 takes precedence.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 2 AS/NZS 1841.4-2007 instead.
2.	Deleting clause 3 entirely.	Deletes AS/NZS 1841 and 1841.1 as reference documents.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 3 AS/NZS 1841.4-2007 instead.
3.	Deleting in clause 5 the text "In addition to the requirements of AS/NZS 1841.1.	Deletes reference to AS/NZS 1841.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 5 AS/NZS 1841.4-2007.



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Schedule of Variations to AS/NZS 1841.5:1997 – Powder type fire extinguishers

Item	Current Mandatory Standard Requirements	Effect	Recommended Action (based on adoption of AS/NZS 1841.1 to 8:2007)	Proposed (references to clauses are AS/NZS 1841.1 to 8:2007 clauses as applicable)
1.	Deleting clause 2 entirely.	This clause references compliance to AS/NZS 1841.1 and where compliance differs, AS/NZS 1841.5 takes precedence.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 2 AS/NZS 1841.5-2007 instead.
2.	Deleting clause 3 entirely.	Deletes AS/NZS 1841 and 1841.1 as reference documents.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 3 AS/NZS 1841.5-2007 instead.
3.	Deleting in clause 7 the text "In addition to the requirements of AS/NZS 1841.1.	Deletes reference to AS/NZS 1841.	Retain, however this is now included in clause 6 in the 2007 Version of AS/NZS 1841.5	Retain but reference clause 6 AS/NZS 1841.5-2007.



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Schedule of Variations to AS/NZS 1841.6:1997 – Carbon dioxide type fire extinguishers

Item	Current Mandatory Standard Requirements	Effect	Recommended Action (based on adoption of AS/NZS 1841.1 to 8-2007)	Proposed (references to clauses are AS/NZS 1841.1 to 8-2007 clauses as applicable)
1.	Deleting clause 2 entirely.	This clause references compliance to AS/NZS 1841.1 and where compliance differs, AS/NZS 1841.6 takes precedence.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 2 AS/NZS 1841.6-2007 instead.
2.	Deleting in clause 3 the text: "1841 Portable fire extinguishers 1841.1 Part 1: General requirements" and "New Zealand Dangerous Goods (Class 2 – Gases) Regulations Department of Labour – Guide to Gas Cylinders".	Deletes AS/NZS 1841 and 1841.1 as reference documents and NZ regs.	Retain for purposes of the Mandatory Standard but note that NZ regs are now known and listed as Hazardous Substances (Compressed Gases) Regulations 2001 and Hazardous Substances and Noxious Organisms Regulations 2001.	Retain intent but reference clause 3 AS/NZS 1841.6-2007 and Hazardous Substances (Compressed Gases) Regulations 2001 and Hazardous Substances and Noxious Organisms Regulations 2001 instead.
3.	Deleting in clause 12 the text "In addition to the requirements of AS/NZS 1841.1.	Deletes reference to AS/NZS 1841.	Retain, however clause 12 in the 2007 Version of AS/NZS 1841.6 only requires the extinguisher to be marked with the word CARBON DIOXIDE in lieu of CARBON DIOXIDE TYPE.	Retain but reference clause 12 AS/NZS 1841.6-2007 instead thereby including reference to CARBON DIOXIDE only.



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Schedule of Variations to AS/NZS 1841.7:1997 – Vaporising-liquid type fire extinguishers

Item	Current Mandatory Standard Requirements	Effect	Recommended Action (based on adoption of AS/NZS 1841.1 to 8-2007)	Proposed (references to clauses are AS/NZS 1841.1 to 8-2007 clauses as applicable)
1.	Deleting clause 2 entirely.	This clause references compliance to Sections 1 to 10 of AS/NZS 1841.1 and where compliance differs, AS/NZS 1841.7 takes precedence.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 2 AS/NZS 1841.7-2007 instead.
2.	Deleting clause 3 entirely.	Deletes AS/NZS 1841 and 1841.1 as reference documents.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 3 AS/NZS 1841.7-2007 instead.
3.	Deleting in Clause 5 the text "In addition to the requirements of AS/NZS 1841.1.	Deletes reference to AS/NZS 1841.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 5 AS/NZS 1841.7-2007 instead.



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Schedule of Variations to AS/NZS 1841.8:1997 – Non-rechargeable type fire extinguishers

Item	Current Mandatory Standard Requirements	Effect	Recommended Action (based on adoption of AS/NZS 1841.1 to 8-2007)	Proposed (references to clauses are AS/NZS 1841.1 to 8-2007 clauses as applicable)
1.	Deleting in clause 1 the second paragraph and replacing it with: "This standard does not apply to aerosol type fire extinguishers."	Deletes reference to non-rechargeable units between 2kg and 2L in size	2007 version of AS/NZS 1841.8 no longer includes this reference. Therefore Mandatory Standard does not need to delete it.	Remove from Mandatory Standard or include the same statement for clarity.
2.	Deleting the first paragraph in clause 2.	This clause references compliance to AS/NZS 1841.1 and where compliance differs, AS/NZS 1841.8 takes precedence.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 2 AS/NZS 1841.8-2007 instead.
3.	Deleting in clause 3 the text "AS 1851 Maintenance of fire protection equipment 1851.1 Part 1: Portable fire extinguishers and fire blankets" and "1841 Portable fire extinguishers 1841.1 Part 1: General requirements" and "NZS 4503 The distribution, installation and maintenance of hand operated fire equipment for use in buildings".	Deletes AS/NZS 1841 and 1841.1 and 1851, 1851.1 and NZS 4503 as reference documents.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 3 AS/NZS 1841.8-2007 instead.



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Schedule of Variations to AS/NZS 1841.8:1997 – Non-rechargeable type fire extinguishers

4.	Deleting in clause 4 the text "In addition to the general requirements of AS/NZS 1841.1.	Deletes reference to AS/NZS 1841.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 4 AS/NZS 1841.8-2007 instead.
5.	Deleting clause 7 entirely.	Deletes the maximum size of non-rechargeable extinguishers	Not mentioned in AS/NZS 1841.8-2007 therefore can be deleted.	Delete
6.	Deleting clause 8 entirely.	Deletes maintenance requirements to be in accordance with AS 1851 or NZS 4503 as applicable.	Retain for purposes of the Mandatory Standard.	Retain but reference clause 7 AS/NZS 1841.8-2007 instead.
7.	Deleting in clause 9 the text "In addition to the requirements of AS/NZS 1841.1, with the exception of clauses 9.3.5(d), 9.3.5 (g), 9.3.5 (h), and 9.5.	Deletes reference to AS/NZS 1841 and excluding specific clauses.	Retain for purposes of the Mandatory Standard. Note specific clauses now 9.5(d), 9.5(g), 9.5(i) and 9.7.	Retain but reference clause 8 AS/NZS 1841.8-2007 and specific clauses 9.5(d), 9.5(g), 9.5(i) and 9.7.instead.



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Appendix 2

Identification of the differences between AS1841 – 1997 and AS1841 – 2007

The tables below identify additional changes that have been incorporated in the 2007 edition of AS1841. FPA Australia considers that these changes are related to ensuring consistent product development leading to intrinsically safer products for consumers. FPA Australia does not believe that any of the changes identified below should be excluded from the mandatory standard.

AS1841.1 General Requirements

New Clause	Old Clause	Title	Difference
3.5	3.5	LIQUID LEVEL INDICATION	Tolerance on accuracy added: $\pm 2.5\%$
3.9	3.9	FILLING (CHARGING)	Added: Water used in filling must be Potable
3.10	n/a	FILLING TOLERANCE	Inclusion of filling tolerances for all extinguishers (a) Water-based extinguishers: $\pm 2.5\%$ by volume. (b) Powder extinguishers— (i) ≤ 1 kg nominal charge $\pm 5\%$ by mass; (ii) > 1 kg but < 3 kg nominal charge $\pm 3\%$ by mass; or (iii) ≥ 3 kg nominal charge $\pm 2\%$ by mass. (c) Vaporizing liquid extinguishers: $\pm 2.5\%$ by mass. (d) Carbon dioxide extinguishers: $+0 - 2.5\%$ by mass.
4.4	4.4	Valve or Cap	Inclusion of a pressure limit of 10kPa above atmosphere for safe removal of the valve if secured by a method other than a screw thread.
5.1	5.1	Fire Rating	Change in title of clause and added the following clause: <i>A rating shall only be applied to an extinguisher that can be shown to have the same performance and extinguishant characteristics as the one that was rated.</i>
5.3.2	n/a	Discharge Test Procedure	Addition of an alternative discharge test procedure where the end point of the discharge is not clear.
6.1	6.1	Vaporizing Liquid Extinguishers	Change in title of clause only. Allowance to use water for discharge test for those substances controlled by Government regulation that prohibits release of agent to atmosphere
6.2.1	6.2.1	Strength Test	Clarification made that only cylinders be tested to point of destruction and other pressure retaining components just need to be pressure tested to minimum



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New Clause	Old Clause	Title	Difference
			requirements but not necessary to point of destruction. Pressure Indicators and rupture devices are now excluded from these tests as these devices are designed to rupture at pressures below the minimum requirement of other pressure retaining parts as a safety pressure relief.
6.4	6.4	Clear Passage Test	Added: "For a flexible hose, the test shall be conducted in the same direction as the intended extinguishant flow."
9.1(b)	9.1	General – Marking	Instructions (including pictures) and Use Pictographs shall be " fully " visible when mounted in a bracket. Was " clearly " visible.
9.2	9.2	Permanent Marking	Cylinders now need to be stamped showing both Month and Year (MM/YY or MM/YYYY) rather than just Year. Added maximum depth of stamp requirement.
9.3.3(c)	9.3.3.7	Use Code Pictographs	Standard now specifies which prohibition pictographs must be used on water (Not E Class and Not F Class) and foam extinguishers (Not E Class)
9.5(a)	9.3.5(a)	Servicing Information	Added the requirement for the phone number in addition to the name and address of the manufacturer or responsible vendor.
9.5(c)	New	Servicing Information	New requirement for the nozzle orifice size to be on the extinguisher label
9.5(h)	New	Servicing Information	New requirement to include the type and manufacturer's identification of the extinguishant contained in the extinguisher.



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AS1841.2 Specific Requirements – Water Extinguishers

New Clause	Old Clause	Title	Difference
6 (a)	6 (a)	Marking	Dropped the requirement to have the words "WATER TYPE STORED PRESSURE" and now only requires the words "WATER"

AS1841.3 Specific Requirements – Water Extinguishers

New Clause	Old Clause	Title	Difference
5	New	Hose Assembly	Added requirement that the rigid part of the discharge nozzle, including any rigid wand, shall not be greater than 150mm
6 (a)	5 (a)	Marking	Dropped the requirement to have the words "WET CHEMICAL (STORED PRESSURE) TYPE" and now only requires the words "WET CHEMICAL"

AS1841.4 Specific Requirements – Foam Extinguishers

New Clause	Old Clause	Title	Difference
5 (a)	5 (a)	Marking	Dropped the requirement to have the words "FOAM TYPE STORED PRESSURE" and now only requires the words "FOAM"



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AS1841.5 Specific Requirements – DCP Extinguishers

New Clause	Old Clause	Title	Difference
5.2	5.1	Powder Compaction	Reduced the minimum number of extinguishers needed for the test from 5 down to 3.
5.2	5.1	Powder Compaction	Added requirement for non-metallic skirt or foot rings to be removed prior to compaction
5.3	5.2	Powder Compaction Bonding	Bonding period changed from 3 months to 90 days
6(a)	7(a)	Marking	Dropped the requirement to have the words "POWDER STORED PRESSURE" and now only requires the words "POWDER"
-	7(c)	Marking	Dropped the requirement to have the words "IT IS DANGEROUS TO USE OTHER THAN THE RECOMMENDED REFILL"

AS1841.6 Specific Requirements – CO2 Extinguishers

New Clause	Old Clause	Title	Difference
5 (c)		Filling Ratio	Added filling ratio provision for extinguishers that are to be exposed to temperatures above 65°C
10.2.3	10.2.3	Horn Fitted to Hose	Added requirement for the means to prevent the separation of the hose and horn during use should a connection fitting become loose)

AS1841.7 Specific Requirements – Vaporizing Liquid Extinguishers

New Clause	Old Clause	Title	Difference
5 (a)	5 (a)	Marking	Dropped the requirement to have the words "STORED PRESSURE TYPE"